

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division

Hortense C. Tippet, _____

Debtor.

Chapter 13
Case No. 24-11685

Motion to Extend the Automatic Stay

Debtor Hortense C. Tippet, by their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on May 16, 2024. They will soon file a plan and all schedules, statements, and other documents required by 11 U.S.C.

§521(a)(1) and Fed. R. Bankr. P. 1007(b).

2. The Debtor was involved in the following active bankruptcies between May 1, 2023 and April 30, 2024:

Case No.	Chapter	Filed	Dismissed	District
24-10745-amc	13	March 3, 2024	April 26, 2024	Eastern District of Pennsylvania

3. Because the Debtor was involved in one active bankruptcy between May 1, 2023, and April 30, 2024, the automatic stay is set to expire on May 30, 2024. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith. Good faith means that there are new circumstances demonstrating that the Debtor

can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).

5. In this case, the Debtor has proposed a different Next Friend who is prepared to comply with all of the Debtor's requirements under the Bankruptcy Code.

6. These changing circumstances demonstrate that the Debtor is likely to successfully reach the end of their chapter 13 plan.

7. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors for the duration of this case.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: May 17, 2024

By: /s/ Michael A. Cibik
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